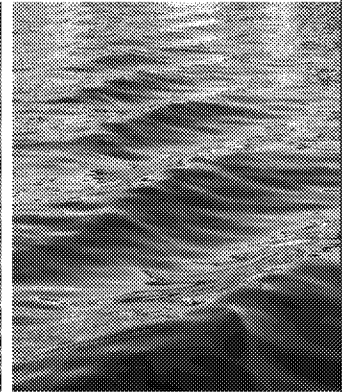


Superfund Priority "Anaconda"

April 2018

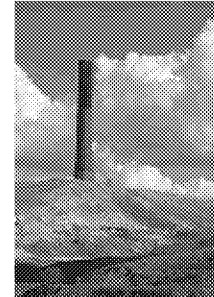


Site Overview

- Anaconda Company Smelter was placed on the NPL in 1983.
- Cleanup began in 1986.
- The site covers over 300 square miles and initially divided into 16 Operable Units (OUs) that have been combined into the following 5 active OUs*:
 - OU 15 – Mill Creek. Former suburban community located adjacent and downwind of the smelter and impacted by high arsenic levels in soils and dust.
 - OU 11 – Flue Dust. This by-product of copper smelting containing very high levels of metals and arsenic, stockpiled at nine locations in the East Anaconda Yards and on Smelter Hill.
 - OU 7 – Old Works/East Anaconda Development Area (OW/EADA). Historic milling and smelting areas located immediately east of Anaconda, including former smelter properties conveyed from Atlantic Richfield to Anaconda-Deer Lodge County (ADLC) for redevelopment
 - OU 16 – Community Soils (CSOUS). Soils and dust within residential and commercial properties, including Anaconda, Opportunity, and adjacent rural areas within the site.
 - OU 4 – Anaconda Regional Water, Waste & Soils (ARWW&S). All remaining waste areas, including the Anaconda Ponds, Opportunity Ponds, Slag and Smelter Hill as well as the adjacent 300 square miles of soil, surface and ground water impacted by the smelter.

*shown in the order that the record of decision (ROD) for the OU was signed

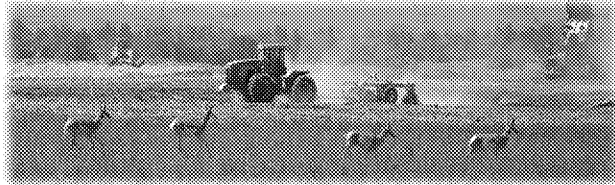
OU	Year Record of Decision Signed	
	Original	Amended
15	1987	
11	1994	
7	1994	
16	1999	2013
4	1999	2011



Cleanup Accomplishments

Since cleanup began in 1986, EPA has overseen numerous removal and remedial cleanup actions

- 10 million cubic yards of tailings, mine wastes, and contaminated soils have been removed and placed in engineered repositories.
- 500 million cubic yards of waste over 5000 acres have been capped in place.
- 12,500 acres of land have been reclaimed.
- 140,000 feet of engineered storm water controls have been built.
- 30,000 feet of stream floodplain have been stabilized or restored.
- 800 acres of wetlands have been created or restored.
- 800 residential and commercial properties have been cleaned up.
- All domestic wells and water supplies within the site have been tested and replaced or treated if necessary.



Revegetation has been so successful that motorists have complained about elk crossing where they have not been before.

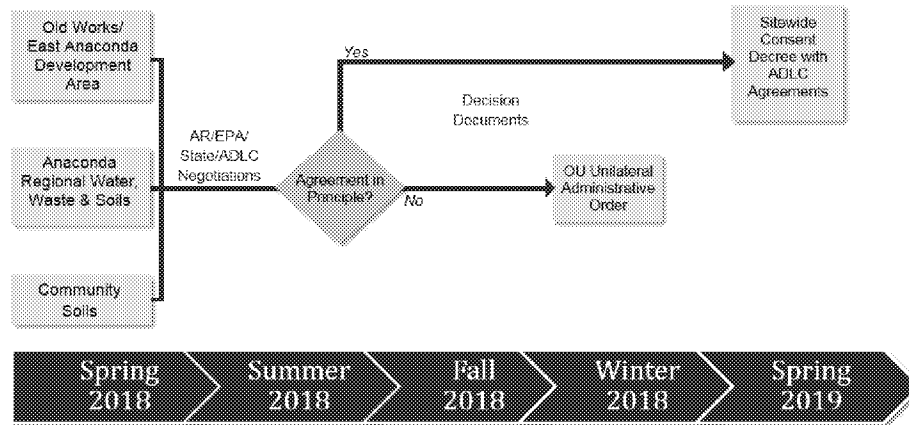
Cleanup Status for Each OU

- **OU 15 – Mill Creek.** Relocation, home demolition, and site stabilization were completed in 1988 under a consent decree. This property was further reclaimed and conveyed to ADLC in 1994. The site is currently being redeveloped by ADLC.
- **OU 11 – Flue Dust.** Flue dust treatment and disposal was completed in 1994 under a consent decree. Atlantic Richfield continues to operation and maintain the repository.
- **OU 7 – Old Works/East Anaconda Development Area.** Capping of the waste areas was completed by 2000, including the construction of the Old Works Golf Course. An additional 900 acres have been cleaned up with nearly 20 new business developments. Atlantic Richfield continues to work with landowners to cleanup the three remaining parcels in this area. A consent decree will direct the long-term management of this area.
- **OU 16 – Community Soils.** The original remedy (cleanup of arsenic in soils and railroad beds) was completed in 2010. Atlantic Richfield continues to implement the current soil and dust cleanup for lead within the site with all properties to be cleaned up by 2025. A consent decree will direct the implementation of institutional controls.
- **OU 4 – Anaconda Regional Water Waste & Soils.** Cleanup has been completed on over 12,500 acres. Atlantic Richfield continues to implement the remaining cleanup of waste areas and upland soils with all areas to be completed by 2025. A consent decree will direct the final cleanup actions and possible waiver of State surface water standards as well as the long-term monitoring and management of the site.

Remaining Cleanup Work

- **OU 15 – Mill Creek.** Cleanup is complete. Anaconda-Deer Lodge County is working with developers to reuse the site.
- **OU 11 – Flue Dust.** Cleanup is complete. Atlantic Richfield is developing a plan to minimize and manage leachate generated from the repository.
- **OU 7 – Old Works/East Anaconda Development Area.** Atlantic Richfield is working with landowners to cleanup the remaining three parcels. A consent decree or UAO will direct the long-term management and redevelopment of this area.
- **OU 16 – Community Soils.** Atlantic Richfield continues to implement the current residential cleanup of lead in soil and dust at the site. A consent decree or UAO will direct the completion of remaining residential and commercial cleanup and implementation of institutional controls.
- **OU 4 – Anaconda Regional Water Waste & Soils.** Atlantic Richfield continues to implement the current cleanup of waste areas and upland soils at the site. A consent decree or UAO will direct the final cleanup actions and possible waiver of State surface water standards as well as the long-term monitoring and management of the site.

Where We Are - Flowchart



AR=Atlantic Richfield
 EPA=U.S. Environmental Protection Agency
 State=State of Montana
 ADLC=Anaconda-Deer Lodge County
 OU=operable unit

Where We Are – Schedule with Milestones

Timeframe	Decision or Action
Spring 2018	Initiate negotiations
Summer 2018	Deadline for agreement in principle between all parties
<u>If agreement reached:</u>	
Fall 2018	Develop and complete decision documents
Fall 2018	Public comment/involvement
Fall/Winter 2018	Negotiate CD and Agreement with ADLC
Spring 2019	CD and ADLC Agreement signed
2019-2025	Remedy implementation under CD and agreement
<u>If agreement is not reached or negotiations fail:</u>	
Fall 2018	Develop and complete decision documents
Winter 2018	Issue UAOs to complete remedial actions
2019-2025	Remedy implementation under UAO

Where We Are Going – Consent Decree with ADLC Agreement

- Anaconda-Deer Lodge County (ADLC) would receive funding for developing and managing conveyed properties including the Old Works Golf Course.
- ADLC would receive funding to implement county institutional controls (i.e., DPS and CPMP/RMAP).
- ADLC would receive funding for the restoration of county properties.
- A consent decree provides for agreement on the remaining cleanup and resolves legal disagreements.
- There will be public input for cleanup decisions.

Where We Are Going – Unilateral Administrative Order

- The Atlantic Richfield Company would be responsible for managing and maintaining all remedies including the Old Works Golf Course.
- ADLC would still be responsible for properly developing conveyed properties in accordance with restrictive covenants.
- Atlantic Richfield would be responsible for implementing site-wide institutional controls (county site-wide institutional controls would not be required for remedy).
- Atlantic Richfield would be responsible for cleaning up all remaining residential soils and attic dust
- A Unilateral Administrative Order (UAO) does not provide any funding to ADLC.
- An UAO does not provide agreement on the cleanup and pushes legal disagreements off indefinitely.
- There will be public input for cleanup decisions.

School Sampling Status

- Sampling of school soils and dust was requested by the Anaconda School District and County.
- Over spring break 2018, EPA conducted interior dust sampling at Head Start, Lincoln elementary, Moodry middle, Anaconda high, Memorial gym, and administration building.
- Other school properties will be sampled later this spring.
- Atlantic Richfield will conduct soils sampling later this spring.
- Results will be available by the end of this school year.
- Any cleanup required will be conducted summer 2018 prior to school starting in the fall.



Interior dust sampling

Human Health Study Status

- The community requested that a health study be conducted in Anaconda.
- EPA has partnered with the Agency of Toxic Substances and Disease Registry and Montana Department of Public Health and Human Services and ADLC Health Department to conduct health study.
- Community listening sessions will be conducted in April to determine a needs assessment.
- Additional sessions will be conducted later in the year to discuss information gathered.
- Blood lead and urine arsenic data will be collected this summer/fall.
- Results of the health study and data collection will be presented in a report in 2019.



Resources

- Atlantic Richfield has conducted most of the cleanup for the Anaconda Smelter Site with oversight from EPA and Montana Department of Environmental Quality.
- EPA estimates that Atlantic Richfield has spent more than \$350 million on cleanup at the site.
- EPA has recovered some of our past costs at Anaconda and has placed these recovered funds into a dedicated account to spend on future remedial response activities where the responsible parties are not required.

Community Engagement and Collaboration

- EPA Regional Administrator has visited Anaconda on multiple occasions to listen to the community
- How can stakeholders and the community participate?
 - Technical Assistance Group
 - Superfund Task Force
 - Site work groups (public health study)
 - Participate/review and comment on decision documents
 - Contact Robert Moler, Community Involvement Coordinator
 - Contact Charlie Coleman, Remedial Project Manager
- Website information
 - <https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0800416>

Finishing up....

EPA is establishing the goal of completing major construction for the Anaconda Smelter Site by the end of 2025.

- EPA will need the assistance of the state, city-county government, potentially responsible parties, and the community in order to accomplish this goal.
- Once major construction is complete, EPA and the State can begin the process of deleting the site from the National Priorities List.
- Operation and maintenance, monitoring, and institutional controls will all continue.
- EPA will continue to evaluate the protectiveness of the remedies for all operable units at the site every 5 years.

